

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Mexico

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

NOV 29 2016

United States of America

v.

MATTHEW J. DYKMAN

Case No. 16-MJ-4220 CLERK

LARRY JUNE

Defendant(s)

CRIMINAL COMPLAINT

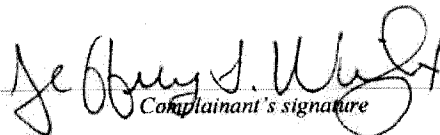
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/25/2016 in the county of San Juan in the
District of New Mexico, the defendant(s) violated:

Code Section	Offense Description
Title 18, U.S.C. Section 1153(a)	Crime on Indian Reservation
Title 18, U.S.C. Section 1111(a)	Murder

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.


Jeffrey T. Wright, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: November 29, 2016


Judge's signature

City and state: Farmington, New Mexico

B. Paul Briones, US Magistrate Judge

Printed name and title

NEW MEXICO

ALBUQUERQUE, NEW MEXICO

United States of America)

vs)

LARRY JUNE)

YEAR OF BIRTH: 1959)

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND PROBABLE
CAUSE ARREST

I, Jeffrey T. Wright, being duly sworn, do hereby
depose and state:

1. I am a Special Agent (SA) with the United States
Department of Justice, Federal Bureau of Investigation
(FBI), and have been employed in that capacity for
approximately eight years. I am currently assigned to the
Albuquerque Division of the FBI, Farmington Resident
Agency, and have primary investigative responsibility for
crimes that occur in Indian Country, including violent
crimes such as homicide, robbery, aggravated assault, and
sexual assault. I am also responsible for investigating
all other federal crimes which fall within the FBI's
purview in the San Juan County area of New Mexico.

2. The information set forth in this affidavit has been
derived from an investigation conducted by your Affiant,
Shiprock Criminal Investigator (CI) Jerrick Curley, Navajo
Department of Criminal Investigations (NDCI), and/or

1 communicated to me by other law enforcement officers of the
2 Navajo Nation and/or witnesses. It is intended to show
3 only that there is sufficient probable cause for an arrest
4 and does not set forth all of my knowledge about this
5 matter.

6 3. This investigation concerns the alleged violation of
7 Title 18 United States Code §1111(a) (Murder) and
8 1153(a) (Criminal Offense committed within Indian Country).

9 4. Your Affiant is aware that on the evening of
10 November 25, 2016, law enforcement officers of the Navajo
11 Police Department (NPD), as well as Emergency Medical
12 Services (EMS) personnel, responded to the report of a
13 stabbing which occurred during a traditional Navajo
14 ceremony in the area of Sheep Springs, New Mexico, within
15 the exterior boundaries of the Navajo Nation Indian
16 Reservation. Responding officers and EMS technicians came
17 into contact with a 53 year-old female, year of birth 1963,
18 identified herein as Jane Doe and who is an enrolled member
19 of the Navajo Nation Indian Tribe, near the intersection of
20 Highway 491 and State Road 134, adjacent to the Sheep
21 Springs convenience store. Jane Doe was transported from
22 the initial scene of the stabbing to this area by concerned
23 citizens in an attempt to meet with EMS. Jane Doe was
24 observed to be unresponsive and bleeding profusely from
25 several wounds.

26 5. After attempting to provide life saving care without
27 success, efforts were discontinued. Jane Doe was
28 subsequently pronounced deceased on November 25, 2016, at

1 approximately 11:35 p.m., by Field Investigator Pauline
2 Houston, New Mexico Office of the Medical Investigator.

3 6. Subsequent investigation determined that Jane Doe
4 was transported by three concerned citizens from
5 approximately two miles away, where she had been selling
6 food from her trailer at a traditional Navajo ceremony,
7 which was a large gathering. The ceremony was held just
8 east of Highway 491, approximately at mile marker 45,
9 within the exterior boundaries of the Navajo Nation Indian
10 Reservation.

11 7. Witness 1, identified as R.E., year of birth 1948,
12 who drove Jane Doe from the site of her trailer to seek
13 help near the Sheep Springs convenience store, told your
14 Affiant he overheard an argument coming from inside Jane
15 Doe's trailer as he sat at a campfire approximately fifteen
16 feet away. He further observed the trailer to be rocking
17 back and forth. When Witness 1 looked through the front
18 service window of the trailer to see what was going on, he
19 saw a man standing over Jane Doe. The man appeared to be
20 hitting Jane Doe. After the man left the trailer and fled
21 the scene, Jane Doe came outside and got inside her van.
22 She appeared to be bleeding from several stab wounds and
23 was moaning. When Witness 1 asked who did this to her, Jane
24 Doe responded, "My husband".

25 8. Witness 2, identified as D.E., year of birth 1974,
26 also overheard an argument between Jane Doe and a man who
27 was assisting her by taking food orders and collecting
28 money. Witness 2 later heard banging noises which sounded

1 like fighting coming from inside Jane Doe's trailer. She
2 subsequently heard a woman's voice yell from inside the
3 trailer, "He has a knife." When Witness 2 looked through a
4 small trailer window, she saw a man standing over Jane Doe.
5 Witness 2 yelled for the man to stop. When Witness 1 later
6 asked who had done this to Jane Doe, Witness 2 heard Jane
7 Doe state, "My husband".

8 9. Witness 3, identified as M.S., year of birth 1999,
9 also stood nearby the trailer and overheard the argument.
10 When he came over to help, Witness 3 heard Jane Doe say her
11 husband had stabbed her.

12 10. Witnesses advised the man who was standing above
13 Jane Doe inside the trailer had fled the scene. He was
14 dressed in a "Carhartt" style work jacket that may have
15 been brown. He also wore a "hoody" sweatshirt.

16 11. Jane Doe's adult children subsequently identified
17 her husband as LARRY JUNE. JUNE was located by NPD officers
18 in the early morning hours of November 26, 2016, at a house
19 in Shiprock, New Mexico, and was subsequently taken into
20 tribal custody. At the time of his arrest, JUNE was dressed
21 in a brown and green camouflage work jacket and a yellow
22 hooded sweatshirt. His sweatpants were also stained with a
23 red substance similar in appearance to blood.

24 12. JUNE was interviewed on November 28, 2016, and
25 provided the following information to your Affiant and CI
26 Curley: JUNE is the husband of Jane Doe. On the night of
27 November 25, 2016, he was at the Navajo ceremony with Jane
28 Doe selling food from Jane Doe's trailer. No other people

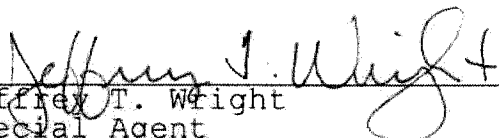
1 were inside the trailer with JUNE and Jane Doe. Sometime
2 after sundown, Jane Doe and JUNE began to argue. She yelled
3 at him several times as people were nearby, causing JUNE to
4 feel embarrassed. After the argument later intensified
5 inside the trailer, Jane Doe antagonized JUNE by poking at
6 him with a lighter. JUNE pushed Jane Doe and they fell
7 together near the stoves. JUNE subsequently punched Jane
8 Doe three times as she leaned against a table. Jane Doe
9 then grabbed a knife from the table with her right hand and
10 swung it toward JUNE. The swinging motion missed JUNE,
11 however, and ended as Jane Doe stabbed herself once in her
12 right side. JUNE thereafter heard a woman ask what was
13 going on. He subsequently left the trailer and walked away.
14 As he walked away, he continued to look back at the
15 trailer. No other people ever entered the trailer.

16 13. Upon physical observation of Jane Doe's body, your
17 Affiant observed her to have at least five stab wounds, to
18 include at least two wounds in the area of her right
19 abdomen, two to her right breast, and one on her back.

20 14. Based upon the information provided in this
21 affidavit, your Affiant submits there is probable cause to
22 believe that on the evening of November 25, 2016, LARRY
23 JUNE, an enrolled member of the Navajo Nation Indian Tribe,
24 was within the territorial jurisdiction of the Navajo
25 Nation Indian Reservation when he killed Jane Doe by
26 stabbing her multiple times, in violation of Title 18,
27 United States Code §1153 (Criminal Offense committed within
28 Indian Country) and 1111 (Murder).

1 15. On November 29, 2016, at approximately 10:30 a.m.,
2 JUNE was arrested by your Affiant on the above stated
3 charges and booked at the San Juan County Adult Detention
4 Center. JUNE's arrest was based on the probable cause
5 stated herein and was deemed immediately necessary to
6 protect the public as he was unexpectedly released from the
7 custody of the Navajo Nation.

8 16. I swear this information to be true and correct to
9 the best of my knowledge and belief.

10
11 
12 Jeffrey T. Wright
13 Special Agent
14 Federal Bureau of Investigation
Farmington, New Mexico

15 Subscribed and sworn to before me this 29th day of
16 November, 2016.

17 
18 United States Magistrate Judge
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